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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

ROSA MARIA STYLES,

Debtor.

Chapter 11

Case No. 19-32881 (ABA)

Honorable Andrew B. Altenburg, Jr.

**CERTIFICATION OF ROBERT SCHWARTZ IN
SUPPORT OF CONFIRMATION OF THE DEBTOR'S
FIRST AMENDED CHAPTER 11 PLAN OF REORGANIZATION**

Robert Schwartz, of full age, certifies as follows:

1. I am the spouse of Rosa Maria Styles, the Chapter 11 debtor ("Debtor" or "Rosa") in the above referenced matter. As such, I have been working with my spouse to resolve her debts. Accordingly, I have personal knowledge of the facts set forth herein. I submit this Certification in support of confirmation of the Debtor's Chapter 11 First Amended Plan of Reorganization ("Amended Plan").

2. On December 9, 2019, the Debtor filed her voluntary petition for relief under Chapter 11 of the Bankruptcy Code. See Docket No. 1. On February 23, 2021, the Amended Plan was filed. See Docket No. 165.

3. The Debtor owns property located at 43 West 12th Street, Avalon, New Jersey (the "Avalon Property"). I reside at the Avalon Property with Rosa. The Avalon Property has the

following encumbrances: first and second mortgages held, respectively, by Thomas Welsh in the aggregate amount of approximately \$2.3 million, and CEBV, LLC holds a claim of \$450,000.

4. I have personally paid off approximately \$600,000 in unsecured debts and judgments on the Avalon Property in this case whether disputed or undisputed¹. Further, I have paid all real estate taxes and have pre-paid the next quarter and an additional \$900. To my knowledge, besides the secured debt on the Avalon Property, there are no remaining unsecured creditors in the case but for AC Electric. Rosa filed a motion to expunge the AC Electric claim which is returnable on March 16, 2021. See Docket No. 164.

5. The Amended Plan provides several alternatives regarding the Avalon Property. First, Mr. Edward W. Weingartner, III has 60 days to close on a sale of the Avalon Property for \$3.5 million. If Mr. Weingartner does not close then either (i) I can pay off the debt, or, alternatively, (ii) Mr. Thomas Welsh will acquire the Avalon Property for \$2.9 million which includes satisfaction of his debt and paying the balance (difference between his debt and \$2.9 million) to the estate to pay off CEBV. Thus, all creditors will be paid.

6. I will have the financial wherewithal to pay off the debt in Rosa's case if Mr. Weingartner fails to close.

I certify under penalty of perjury that the foregoing statements made by me are true and correct. If any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Robert Schwartz

ROBERT SCHWARTZ

Dated: March 8, 2021

¹ I disputed the claim of Sussman in the amount of approximately \$229,000 in that the claim is unsubstantiated, however, in order to confirm the Plan, I paid the Sussman claim.